

Denise Carlon, ESQUIRE  
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Attorneys for Specialized Loan Servicing LLC, as servicer for Citigroup Mortgage Loan Trust Inc., Asset-Backed Pass-Through Certificates, Series 2007- AMC1, U.S. Bank National Association, as Trustee

IN THE MATTER OF:

Autumn M Urling

DEBTOR(S),

**IN THE UNITED STATES  
BANKRUPTCY COURT FOR THE  
DISTRICT OF NEW JERSEY**

CHAPTER 13  
CASE NO. 17-27154 JKS

NOTICE OF OBJECTION

The undersigned, Denise Carlon, Esquire For KML Law Group, P.C., attorney for Secured Creditor **Specialized Loan Servicing LLC, as servicer for Citigroup Mortgage Loan Trust Inc., Asset-Backed Pass-Through Certificates, Series 2007- AMC1, U.S. Bank National Association, as Trustee**, the holder of a Mortgage on the debtors' premises at **110 Valley Road Montclair Township, NJ 07042** hereby objects to the confirmation of the debtors' proposed Chapter 13 Plan for the following reasons:

1. On August 31, 2017, Secured Creditor filed a secured proof of claim for pre-petition arrears in the amount of \$614,016.56.
2. Debtor's plan fails to provide treatment for the arrearage claim of the Secured Creditor.
3. Debtor's Plan understates the amount of the Secured Creditor's claim by \$614,016.56, and does not provide sufficient funding to pay said claim.
4. Accordingly, Debtor's plan is NOT feasible, as it does not fully compensate the Movant.
5. In addition, the debtor's plan fails to comply with 11 U.S.C. 1322 and 11 U.S.C. 1325.

In the event the debtors cure the aforesaid payments due outside the Chapter 13 Plan prior to the Confirmation Hearing, the undersigned will not appear at the Confirmation Hearing and aforesaid objections should be deemed waived.

**/s/ Denise Carlon, Esquire**

Denise Carlon, ESQUIRE  
Attorney for Specialized Loan Servicing LLC, as servicer for  
Citigroup Mortgage Loan Trust Inc., Asset-Backed Pass-  
Through Certificates, Series 2007- AMC1, U.S. Bank National  
Association, as Trustee

Dated: September 15, 2017